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ATTORNEYS FOR PLAINTIFF

## **TORNEIS FOR PLAIN**

UNITED STATES

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China company; CHINA INTERNATIONAL COMMUNICATIONS CO., LTD., a China company; TVB HOLDINGS (USA), INC., a California corporation; and DISH NETWORK L.L.C., a Colorado corporation,  
Plaintiffs,

CREATE NEW TECHNOLOGY (HK) LIMITED, a Hong Kong company; HUA YANG INTERNATIONAL TECHNOLOGY LIMITED, a Hong Kong company; SHENZHEN GREATVISION NETWORK TECHNOLOGY CO. LTD., a China company; CLUB TVPAD, INC., a California corporation; BENNETT WONG, an individual, ASHA MEDIA GROUP INC. d/b/a TVPAD.COM, a Florida corporation; AMIT BHALLA, an individual; NEWTVPAD LTD. COMPANY d/b/a NEWTVPAD.COM a/k/a TVPAD USA, a Texas corporation; LIANGZHONG ZHOU, an individual; HONGHUI CHEN d/b/a E-DIGITAL, an individual; JOHN DOE 1 d/b/a BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV; JOHN DOE 5 d/b/a GANG YUE; JOHN DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7 d/b/a GANG TAI WU XIA; and JOHN DOE 8-10,

} Case No.  
} CV 15-1869 MMM (AJWx)

**EX PARTE APPLICATION TO  
ADVANCE HEARING ON  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION  
FROM JUNE 8, 2015 TO  
APRIL 27, 2015;  
DECLARATION OF CARLA  
A. MCCUALEY AND  
EXHIBITS A THROUGH E**

} [Proposed Order concurrently submitted]

} Current Hearing: June 8, 2015  
} at 10:00 a.m.

} Proposed Hearing: April 27, 2015  
} at 10:00 a.m.

} Courtroom: 780

} Action Filed: March 13, 2015

1       **PLEASE TAKE NOTICE** that pursuant to Local Rule 7-19, Plaintiffs China  
 2 Central Television, China International Communications Co., Ltd., TVB Holdings  
 3 (USA), Inc., and DISH Network L.L.C. (collectively “Plaintiffs”) hereby request  
 4 through the instant Ex Parte Application that Plaintiffs’ pending Motion for  
 5 Preliminary Injunction, now set for June 8, 2015 at 10:00 a.m., be advanced and  
 6 specially set for a new hearing date of April 27, 2015 at 10:00 a.m.

7       Good cause exists to grant this application because the first hearing date listed  
 8 as available on the Court’s civil motion calendar when Plaintiffs filed their Motion  
 9 for Preliminary Injunction on March 16, 2015 was June 8, 2015. That hearing date is  
 10 still over ten weeks away as of the date of the filing of the instant Ex Parte.  
 11 Plaintiffs’ Motion for a Preliminary Injunction seeks relief for immediate and  
 12 irreparable harm that is continuing and will continue until Plaintiffs’ Motion can be  
 13 heard. As set forth below and in Plaintiffs’ pending Motion for Preliminary  
 14 Injunction, it is crucial that Plaintiff's PI Motion be heard as soon as possible.

15       Concurrent with the filing of its Complaint on March 13, 2015, Plaintiffs  
 16 immediately took steps to personally serve all defendants with the Complaint in this  
 17 action. As of today, only one Defendant, Shenzhen Greatvision Network  
 18 Technology Co. Ltd., has not been personally served with the complaint. All  
 19 Defendants that are subject to the Motion, including CreateNewTechnology (HK)  
 20 Limited (“CNT”), Club TVPad Inc. (“Club TVpad”) and Asha Media Group Inc.  
 21 (“Asha Media”) (the “PI Defendants”), were personally served with the complaint in  
 22 this action, and were personally served or mail served with the Motion for  
 23 Preliminary Injunction, last week. Therefore, if Plaintiffs’ requested relief for  
 24 expediting the hearing in this action on the Preliminary Injunction is granted, the  
 25 Defendants addressed in the Motion for Preliminary Injunction will have had more  
 26 than the full statutory notice of the Motion as provided in the Local Rules.

27       Although the PI Defendants have been served, none have as of yet entered an  
 28 appearance in the instant action. However, Plaintiffs have contacted all known

1 contact information for the Defendants in an effort to give notice of the instant Ex  
2 Parte pursuant to Local Rule 7-19, as set forth in the accompanying declaration of  
3 Carla A. McCauley at Paragraph 5 and Exhibits C through E.

4 This Application is based upon the attached Memorandum of Points and  
5 Authorities, the Declaration of Carla A. McCauley and accompanying exhibits, the  
6 pleadings and files in this action, and such other argument and evidence as may be  
7 presented at any hearing on the Application.

8  
9 DATED: March 25, 2015

DAVIS WRIGHT TREMAINE LLP  
CARLA A. McCAULEY  
ROBERT D. BALIN (*pro hac vice*)  
LACY H. KOONCE, III (*pro hac vice*)  
SAMUEL BAYARD (*pro hac vice*)  
GEORGE WUKOSON (*pro hac vice*)

10  
11  
12  
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14 By: /s Carla A. McCauley  
15 Carla A. McCauley  
16 Attorneys for Plaintiffs  
17 CHINA CENTRAL TELEVISION; CHINA  
INTERNATIONAL COMMUNICATIONS CO.,  
LTD.; TELEVISION BROADCASTS LIMITED;  
TVB HOLDINGS (USA), INC.; AND DISH  
NETWORK L.L.C.  
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1                   **MEMORANDUM OF POINTS AND AUTHORITIES**

2                   **I. INTRODUCTION AND STATEMENT OF RELEVANT FACTS**

3                   On March 13, 2015, Plaintiffs filed their Complaint in this action for copyright  
 4 and trademark infringement based upon Defendants' operation of a parallel pirate  
 5 broadcasting network that perpetrates and facilitates copyright infringement on a  
 6 massive scale. Among the victims of this piracy are Plaintiff China Central  
 7 Television ("CCTV")—the largest television broadcaster in mainland China—and  
 8 Television Broadcasts Limited ("TVB")—the largest television broadcaster in Hong  
 9 Kong. This pirate network streams entire CCTV and TVB television channels over  
 10 the Internet to U.S. users of the "TVpad" set-top box, 24 hours a day and seven days  
 11 a week. CNT and its affiliates accomplish this piracy in part through a peer-to-peer  
 12 network—like Napster, Grokster, and BitTorrent—through which TVpad users not  
 13 only receive unauthorized foreign programming in the U.S., but retransmit it to large  
 14 numbers of other TVpad users.

15                  In its Motion for Preliminary Injunction, Plaintiffs provided detailed evidence  
 16 of CNT's liability for secondary copyright infringement by, among other actions  
 17 detailed in the papers, promoting infringement by TVpad users, providing infringing  
 18 apps that deliver free and unauthorized content to TVpad users, providing technical  
 19 support to help users access Plaintiffs' content, controlling the servers that facilitate  
 20 unauthorized streaming, and profiting from the infringement. Plaintiffs also provided  
 21 detailed evidence that CNT's U.S. distributors—including PI Defendants Asha  
 22 Media and Club TVpad—likewise advertise and promote the infringing apps and  
 23 infringing capabilities of TVpad, and help customers use the infringing apps to  
 24 access CCTV and TVB programming.

25                  As a result of this conduct, Plaintiffs suffer irreparable injury on an hourly and  
 26 daily basis. Not only is Plaintiffs' content being infringed as we speak, but Plaintiffs  
 27 are, daily, losing opportunities to provide content to U.S. customers through  
 28 authorized licensees.

When Plaintiffs filed their Motion for Preliminary Injunction on March 16, 2015, the first available date listed with the Court for a hearing was June 8, 2015. *See Declaration of Carla A. McCauley (“McCauley Decl.”) ¶ 2.* Now that Plaintiffs have, over the course of last week, personally served the complaint on all of the PI Defendants, as well as the other U.S. based and Hong-Kong based Defendants named in the action<sup>1</sup>, as well as serving the Motion for Preliminary Injunction, Plaintiffs are still 10 weeks removed from possible relief in this action. Given the nature of the irreparable injury experienced by Plaintiffs during the delay on a decision on its motion, Plaintiffs respectfully request that the hearing be advanced to April 27, 2015, which will still provide more notice to the Defendants than that provided under Local Rule.

## II. ARGUMENT

This Court has held that *ex parte* relief is appropriate if:

- (1) the moving party’s cause will be irreparably prejudiced if the underlying motion is heard according to regular noticed motion procedures; and
- (2) the moving party is without fault in creating the crisis that requires ex parte relief, or that the crisis occurred as a result of excusable neglect.

*See Mission Power Eng’g. Co. v. Continental Cas. Co.*, 883 F. Supp. 488, 495 (C.D. Cal. 1995). Plaintiffs meet both tests.

First, this Application only seeks to have Plaintiffs’ Motion for Preliminary Injunction heard slightly beyond the regularly noticed motion time period of 28 days from the date of hand delivery of the notice and 31 days from the date of mail delivery of the notice. Specifically, Defendant CNT was personally served in Hong Kong with the Motion for Preliminary Injunction on March 18, 2015. Asha Media and Club TVpad were both mail served with the Motion for Preliminary Injunction

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<sup>1</sup> Defendant Shenzhen Greatvision Network Technology Co. Ltd. is based in mainland China and subject to Hague Convention service protocols, and as a consequence, has not yet been served.

on March 17, 2015, and again mail served on March 20, 2015 after these defendants were personally served with the summons and complaint. McCauley Decl. ¶¶3-4, Exs. A, B. Therefore, Plaintiffs' requested hearing date of April 27, 2015 is well beyond the date ordinarily provided for a regularly noticed motion under these procedures. Local Rule 6-1. This application is necessary because the Court's calendar did not list at time of filing an available hearing date for a noticed motion prior to June 8, 2015. McCauley Decl. ¶ 2. As discussed above, Plaintiffs' Motion seeks to halt actionable, infringing conduct that is occurring right now and will continue to occur until that Motion is heard. Hence, Plaintiffs' will continue to suffer immediate and irreparable harm from Defendants' infringement, if Plaintiffs' Motion for Preliminary Injunction is not granted, and its Motion is not heard at the earliest possible date on regular notice. *See Dkt 23-1 at 119-125, 134-138, 148-150.* (declarations in support of Motion for Preliminary Injunction detailing irreparable injury experienced by each Plaintiff).

Second, Plaintiffs are without fault in creating this emergency. Plaintiffs filed their Complaint on March 13, 2015, and only the evening of the filing received the Notice of Assignment. McCauley Decl. ¶ 2. Only then did Plaintiffs become aware of the fact that the first available hearing date this Court could hear its Motion was June 8, 2015. *Id.* All earlier dates are marked as closed on the Court's calendar. Hence, due to the Court's calendar, Plaintiffs could not have had their Motion heard prior to June 8, 2015, even though the proposed April 27, 2015 hearing date is within the statutory notice period set by the Local Rules. Local Rule 6-1.

### III. CONCLUSION

For all the reasons stated above, Plaintiffs respectfully request that the Court grant their Ex Parte Application and advance the hearing date on Plaintiffs' Motion for Preliminary Injunction to April 27, 2015 at 10:00 a.m., or the first available date that the Court may hear the Motion.

1 DATED: March 25, 2015

DAVIS WRIGHT TREMAINE LLP  
CARLA A. McCUALEY  
ROBERT D. BALIN (*pro hac vice*)  
LACY H. KOONCE, III (*pro hac vice*)  
SAMUEL BAYARD (*pro hac vice*)  
GEORGE WUKOSON (*pro hac vice*)

6 By: /s Carla A. McCauley  
Carla A. McCauley  
7 Attorneys for Plaintiffs  
CHINA CENTRAL TELEVISION; CHINA  
8 INTERNATIONAL COMMUNICATIONS CO.,  
LTD.; TELEVISION BROADCASTS LIMITED;  
9 TVB HOLDINGS (USA), INC.; AND DISH  
NETWORK L.L.C.

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1                   **DECLARATION OF CARLA A. MCCUALEY**

2                   I, Carla A. McCauley, declare as follows:

3                 1. I am licensed to practice law before all the courts in the State of  
 4                 California and am admitted to the United States Court of Appeals for the Ninth  
 5                 Circuit. I am a partner at Davis Wright Tremaine LLP, counsel for Plaintiffs in the  
 6                 above-entitled matter. I submit this Declaration in support of Plaintiffs' Ex Parte  
 7                 Application to Advance the Hearing on Plaintiffs' Motion for Preliminary Injunction.  
 8                 I have personal knowledge of the facts contained herein, and, if called upon as a  
 9                 witness, I could and would testify competently about these facts, except for those  
 10                 matters stated expressly upon information and belief, which matters are believed to  
 11                 be true.

12                 2. On March 13, 2015, Plaintiffs filed their Complaint in this action. I  
 13                 received notice after 5:00 p.m. on March 13, 2015 of the Notice of Assignment. Later  
 14                 on Friday evening, and again on the morning of Monday, March 16, 2015, I checked  
 15                 the Court's website to search for available hearing dates for the filing of Plaintiffs'  
 16                 Motion for Preliminary Injunction. All dates for Judge Morrow from April through  
 17                 June 1, 2015 were closed. The first available open calendar date available was June  
 18                 8, 2015 at 10:00 a.m.

19                 3. Plaintiffs filed their Motion for Preliminary Injunction on March 16,  
 20                 2015. Papers were concurrently provided to counsel in Hong Kong for personal  
 21                 service on Defendant CNT immediately after filing the Motion on March 16, 2015,  
 22                 which based on the time change, was then March 17, 2015 in Hong Kong. Personal  
 23                 service of the Motion for Preliminary Injunction, as well as the summons and  
 24                 complaint, was attempted on CNT on March 17, 2015 and effectuated on March 18,  
 25                 2015. Attached hereto as Exhibit A is the proof of service by hand delivery for the  
 26                 Motion for Preliminary Injunction on CNT.

27                 4. The Motion for Preliminary Injunction was mail served on all U.S.  
 28                 based defendants on March 17, 2015. Efforts to personally serve all U.S. based

1 defendants continued all last week, until all U.S. based defendants were personally  
 2 served. Once I received confirmation of service, I caused Plaintiffs' Motion for  
 3 Preliminary Injunction to again be mail served on all defendants at the service  
 4 addresses where service of the complaint and summons had been effectuated. Asha  
 5 Media was therefore mail served twice, on both March 17, 2015 and again on March  
 6 19, 2015. Club TVpad was mail served once on March 17, 2015, and Club TVpad's  
 7 attorney, Soyeun Choi, was mail served on March 19, 2015. Thus, service of all  
 8 defendants who are the subject of Plaintiffs Motion for Preliminary Injunction—  
 9 namely CNT, Asha Media and Club TVpad—have been served well beyond the 28  
 10 days required for personal service under Local Rule and 31 days required for mail  
 11 service under Local Rule. Attached hereto as **Exhibit B** are true and correct copies  
 12 of the mail delivery proofs of service for these defendants.

13       5. I and my colleagues working at my direction, provided notice to CNT,  
 14 Asha Media and Club TVpad of Plaintiffs' intention to file the instant ex parte  
 15 application, and the requirement that the PI Defendants provide any opposition  
 16 within 24 hours of that filing, as follows:

- 17           a. On March 25, 2015, my colleague Lance Koonce, attorney of record in  
                   this matter, caused a letter of notice to be emailed to Owen Tse of the  
                   law firm Vivien Chan & Co., with instructions for personal delivery of  
                   the notice letter to CNT at its registered address. A true and correct  
                   copy of those email communications, on which I was copied, are  
                   attached hereto as **Exhibit C**.
- 18           b. On March 25, 2015, my colleague Lance Koonce, emailed  
                   oneamit@gmail.com and sales@tvpad.com, which is an email address  
                   believe to be associated with Asha Media. A true and correct copy of  
                   Mr. Koonce's email is attached hereto as **Exhibit D**.
- 19           c. On March 25, 2015 at 5:45 p.m., I emailed counsel for Club TVpad,  
                   Soyeun Choi, with notice of the pending ex parte application. A true  
                   copy of that email is attached hereto as **Exhibit E**.

1 and correct copy of my email and Ms. Choi's response is attached hereto  
2 as **Exhibit E.**

3 I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct.

5 Executed March 25, 2015 at Los Angeles, California.

6 \_\_\_\_\_/s **Carla A. McCauley**  
7 Carla A. McCauley

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# **EXHIBIT A**

1 CARLA A. McCUALEY (State Bar No. 223910)  
carlamccaulley@dwt.com  
2 DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, 24th Floor  
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lancekoonce@dwt.com  
6 SAMUEL BAYARD (*pro hac vice* pending)  
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7 GEORGE WUKOSON (*pro hac vice* pending)  
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8 DAVIS WRIGHT TREMAINE LLP  
1633 Broadway  
9 New York, New York 10019  
10 Tel.: (212) 489-8230 Fax: (212) 489-8340  
ATTORNEYS FOR PLAINTIFFS

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

13 CHINA CENTRAL TELEVISION, a China  
company; CHINA INTERNATIONAL  
14 COMMUNICATIONS CO., LTD., a China  
company; TVB HOLDINGS (USA), INC., a  
15 California corporation; and DISH  
NETWORK L.L.C., a Colorado limited  
liability company,

16 Plaintiffs,

17 vs.

18 CREATE NEW TECHNOLOGY (HK)  
LIMITED, a Hong Kong company; HUA  
YANG INTERNATIONAL TECHNOLOGY  
19 LTD., a Hong Kong company; SHENZHEN  
GREATVISION NETWORK  
20 TECHNOLOGY CO. LTD., a China  
company; CLUB TVPAD, INC., a California  
corporation; BENNETT WONG, an  
individual; ASHA MEDIA GROUP INC.  
21 d/b/a TVPAD.COM, a Florida corporation;  
AMIT BHALLA, an individual;  
22 NEWTVPAD LTD CO. a/k/a TVPAD USA,  
a Texas corporation; LIANGZHONG ZHOU,  
23 an individual; HONGHUI CHEN d/b/a e-  
Digital, an individual; JOHN DOE 1 d/b/a  
24 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
25 JOHN DOE 5 d/b/a GANG YUE; JOHN  
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
26 d/b/a GANG TAI WU XIA; and JOHN DOES  
27 8-10,

28 Defendants.

) Case No.  
**CV 15-1869 MMM (AJWx)**

) **PROOF OF SERVICE BY HAND  
DELIVERY**

1                   PROOF OF SERVICE BY HAND DELIVERY

2                   I am employed in Hong Kong Special Administrative Region of the People's Republic of  
3                   China, I am over the age of 18 and not a party to the within action. My business address is 57/F  
4                   Cheung Kong Center, 2 Queen's Road Central, Hong Kong.

5                   On March 17, 2015, I served the following document(s):

6                   1. NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION;  
7                   MEMORANDUM OF POINTS AND AUTHORITIES  
8                   2. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
9                   PRELIMINARY INJUNCTION, VOLUME 1 OF 7  
10                  3. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
11                  PRELIMINARY INJUNCTION, VOLUME 2 OF 7  
12                  4. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
13                  PRELIMINARY INJUNCTION, VOLUME 3 OF 7  
14                  5. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
15                  PRELIMINARY INJUNCTION, VOLUME 4 OF 7  
16                  6. COMPENDIUM OF EVIDENCEIN SUPPORT OF PLAINTIFFS' MOTION FOR  
17                  PRELIMINARY INJUNCTION, VOLUME 5 OF 7  
18                  7. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
19                  PRELIMINARY INJUNCTION, VOLUME 6 OF 7  
20                  8. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
21                  PRELIMINARY INJUNCTION, VOLUME 7 OF 7  
22                  9. [PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

23                  on the below parties in this action or proceeding, by personally delivering a copy thereof, enclosed  
24                  in 5 arch files, to the addressee(s) at the following address(es):

25                  **Hua Yang International Technology Limited, Rm. 19C, Lockhart Ctr., 301-307 Lockhart  
26                  Rd., Wan Chai, Hong Kong**

27                  Executed on March 18, 2015, at Hong Kong Special Administrative Region of the People's  
28                  Republic of China.

29                   Federal   I declare under penalty of perjury under the laws of the United States of America  
30                  that the foregoing is true and correct and that I have served the above referenced  
31                  documents at the direction of a member of the bar of this Court.

32                  LEUNG SHUN CHI

33                  Print Name

34                  Signature

1                   **PROOF OF SERVICE BY HAND DELIVERY**

2                   I am employed in Hong Kong Special Administrative Region of the People's Republic of  
3                   China, I am over the age of 18 and not a party to the within action. My business address is 57/F  
                 Cheung Kong Center, 2 Queen's Road Central, Hong Kong.

4                   On March 18, 2015, I served the following document(s):

5. 1. NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION;  
                 MEMORANDUM OF POINTS AND AUTHORITIES
6. 2. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 1 OF 7
7. 3. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 2 OF 7
8. 4. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 3 OF 7
9. 5. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 4 OF 7
10. 6. COMPENDIUM OF EVIDENCEIN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 5 OF 7
11. 7. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 6 OF 7
12. 8. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR  
                 PRELIMINARY INJUNCTION, VOLUME 7 OF 7
13. 9. [PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

14                   on the below parties in this action or proceeding, by personally delivering a copy thereof, enclosed  
15                   in 5 arch files, to the addressee(s) at the following address(es):

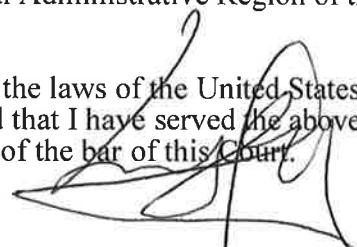
16                   **Create New Technology (HK) Limited, Room D, 10/F, Tower A, Billion Centre, 1 Wang  
                 Kwong Road, Kowloon Bay, Kowloon, Hong Kong**

17                   Executed on March 18, 2015, at Hong Kong Special Administrative Region of the People's  
                 Republic of China.

18                    Federal   I declare under penalty of perjury under the laws of the United States of America  
                 that the foregoing is true and correct and that I have served the above referenced  
                 documents at the direction of a member of the bar of this Court.

19                   LEUNG SHUN CHI

20                   Print Name

21                     
Signature

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On March 18, 2015, I served the foregoing document(s) described as: **PROOF OF SERVICE BY HAND DELIVERY**

by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

|   |  |
|---|--|
| Club TVpad, Inc.  | 3240 Shawn Way<br>Hayward, CA 94541  |
| Bennett Wong  | 3240 Shawn Way<br>Hayward, CA 94541  |
| Asha Media Group  | 10031 Remington Drive,<br>Riverview, FL 33578,   |
| Amit Bhalla   | 10031 Remington Drive,<br>Riverview, FL 33578  |
| newTVpad Ltd. Co. d/b/a newtvpad.com a/k/a<br>TVpad USA | 7411 La Bolsa Dr., Dallas<br>TX 75248  |
| Liangzhong Zhou   | 7411 La Bolsa Dr.,<br>Dallas TX 75248  |
| Honghui Chen d/b/a e-Digital                            | 229 S Marguerita Avenue<br>Alhambra, CA 91801  |
| Create New Technology (HK) Limited                      | Limited, Room D,<br>10/F, Tower A, Billion Centre,<br>1 Wang Kwong Road,<br>Kowloon Bay, Kowloon, Hong Kong, China |
| Hua Yang International Technology Ltd                   | Room 19c, Lockhart Rd.,<br>301-307 Lockhart Rd.,<br>Wan Chai, Hong Kong, China                                     |

I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on March 18, 2015, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Frank M. Romero

Print Name

Signature

**Case 2:15-cv-01869-MMM-AJW Document 40 Filed 03/26/15 Page 16 of 36 Page ID #:1925****Service of Subsequent Document Filings:**[2:15-cv-01869-MMM-AJW China Central Television et al v. Create New Technology HK Limited et al](#)ACCO,(AJWx),**AO120, AO121, DISCOVERY, MANADR, RELATED-P****UNITED STATES DISTRICT COURT for the CENTRAL DISTRICT OF CALIFORNIA****Notice of Electronic Filing**

The following transaction was entered by McCauley, Carla on 3/18/2015 at 9:09 AM PDT and filed on 3/18/2015

**Case Name:** China Central Television et al v. Create New Technology HK Limited et al**Case Number:** [2:15-cv-01869-MMM-AJW](#)**Filer:** China Central Television

China International Communications Co., Ltd.

Dish Network L.L.C.

TVB Holdings USA Inc

**Document Number:** [33](#)**Docket Text:****Proof OF SERVICE China Central Television, China International Communications Co., Ltd., Dish Network L.L.C., TVB Holdings USA Inc, re MOTION for Preliminary Injunction . Motion[23] (McCauley, Carla)****2:15-cv-01869-MMM-AJW Notice has been electronically mailed to:**

Carla A McCauley carlamccauley@dwt.com, frankromero@dwt.com

George P Wukoson georgewukoson@dwt.com

Lacy H Koonce , III lancekoonce@dwt.com

Robert D Balin robbalin@dwt.com

Samuel M Bayard samuelbayard@dwt.com

**2:15-cv-01869-MMM-AJW Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :**

The following document(s) are associated with this transaction:

**Document description:** Main Document**Original filename:** C:\Users\rome\Desktop\Proof of Service by Hand Delivery.pdf**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=3/18/2015] [FileNumber=19133453-0] [7ebb117819717e3864da6a163fc4d00a85428637d39f11cf4a0d5b7b2db742329a4e7d3d89882c4dd76f31344b8e7b9a3de3bc905640c3d7ce1fdbd54fef5124]]

# **EXHIBIT B**

1 CARLA A. McCUALEY (State Bar No. 223910  
carlamccaulley@dwt.com  
2 DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, 24th Floor  
3 Los Angeles, California 90017-2566  
Tel.: (213) 633-6800 Fax: (213) 633-6899  
4 ROBERT D. BALIN (*pro hac vice* pending)  
bobbalin@dwt.com  
5 LACY H. KOONCE, III (*pro hac vice* pending)  
lancekoonce@dwt.com  
6 SAMUEL BAYARD (*pro hac vice* pending)  
samuelbayard@dwt.com  
7 GEORGE WUKOSON (*pro hac vice* pending)  
georgewukoson@dwt.com  
8 DAVIS WRIGHT TREMAINE LLP  
1633 Broadway  
New York, New York 10019  
Tel.: (212) 489-8230 Fax: (212) 489-8340  
10 ATTORNEYS FOR PLAINTIFFS

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 CHINA CENTRAL TELEVISION, a China company; CHINA INTERNATIONAL  
14 COMMUNICATIONS CO., LTD., a China company; TVB HOLDINGS (USA), INC., a  
15 California corporation; and DISH  
16 NETWORK L.L.C., a Colorado limited liability company,

Plaintiffs,

17 vs.

18 CREATE NEW TECHNOLOGY (HK) LIMITED, a Hong Kong company; HUA YANG  
19 INTERNATIONAL TECHNOLOGY LTD., a Hong Kong company; SHENZHEN GREATVISION  
20 NETWORK TECHNOLOGY CO. LTD., a China company; CLUB TVPAD, INC., a California  
21 corporation; BENNETT WONG, an individual; ASHA MEDIA GROUP INC.  
22 d/b/a TVPAD.COM, a Florida corporation; AMIT BHALLA, an individual;  
23 NEWTPAD LTD CO. a/k/a TVPAD USA, a Texas corporation; LIANGZHONG ZHOU,  
24 an individual; HONGHUI CHEN d/b/a e-Digital, an individual; JOHN DOE 1 d/b/a BETV;  
25 JOHN DOE 2 d/b/a YUE HAI; JOHN DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
26 JOHN DOE 5 d/b/a GANG YUE; JOHN DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
27 d/b/a GANG TAI WU XIA; and JOHN DOES 8-10,

Defendants.

} Case No.  
**CV 15-1869 MMM (AJWx)**  
} **PROOF OF SERVICE BY U.S.**  
} **MAIL**

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On March 17, 2015, I served the foregoing document(s) described as:

1. NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION; MEMORANDUM OF POINTS AND AUTHORITIES
2. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 1 OF 7
3. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 2 OF 7
4. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 3 OF 7
5. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 4 OF 7
6. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 5 OF 7
7. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 6 OF 7
8. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 7 OF 7
9. [PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

|                         |  |
|-------------------------|--|
| <b>Club TVpad, Inc.</b> | <b>3240 Shawn Way<br/>Hayward, CA 94541,</b>           |
| <b>Bennett Wong</b>     | <b>3240 Shawn Way<br/>Hayward, CA 94541</b>            |
| <b>Asha Media Group</b> | <b>10031 Remington Drive,<br/>Riverview, FL 33578,</b> |

|   |   |   |
|---|---|---|
| 1 | Amit Bhalla   | 10031 Remington Drive<br>Riverview, FL 33578  |
| 2 | newTVpad Ltd. Co. d/b/a<br>newtvpad.com a/k/a TVpad USA | 7411 La Bolsa Drive<br>Dallas TX 75248,       |
| 3 | Liangzhong Zhou   | 7411 La Bolsa Drive<br>Dallas TX 75248        |
| 4 | Honghui Chen d/b/a e-Digital                            | 229 S Marguerita Avenue<br>Alhambra, CA 91801 |

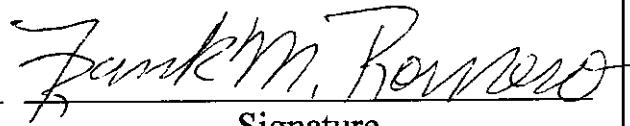
I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on March 17, 2015, at Los Angeles, California.

Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Frank M. Romero

Print Name



Signature

**Case 2:15-cv-01869-MMM-AJW Document 40 Filed 03/26/15 Page 21 of 36 Page ID #:1930****Service of Subsequent Document Filings:**[2:15-cv-01869-MMM-AJW China Central Television et al v. Create New Technology HK Limited et al](#)ACCO,(AJWx),**AO120, AO121, DISCOVERY, MANADR, RELATED-P****UNITED STATES DISTRICT COURT for the CENTRAL DISTRICT OF CALIFORNIA****Notice of Electronic Filing**

The following transaction was entered by McCauley, Carla on 3/17/2015 at 5:44 PM PDT and filed on 3/17/2015

**Case Name:** China Central Television et al v. Create New Technology HK Limited et al**Case Number:** [2:15-cv-01869-MMM-AJW](#)**Filer:** China Central Television

China International Communications Co., Ltd.

Dish Network L.L.C.

TVB Holdings USA Inc

**Document Number:** [32](#)**Docket Text:****OF SERVICE China Central Television, China International Communications Co., Ltd., Dish Network L.L.C., TVB Holdings USA Inc, re MOTION for Preliminary Injunction . Motion[23] (McCauley, Carla)****2:15-cv-01869-MMM-AJW Notice has been electronically mailed to:**

Carla A McCauley carlamccauley@dwt.com, frankromero@dwt.com

George P Wukoson georgewukoson@dwt.com

Lacy H Koonce , III lancekoonce@dwt.com

Robert D Balin robbalin@dwt.com

Samuel M Bayard samuelbayard@dwt.com

**2:15-cv-01869-MMM-AJW Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :**

The following document(s) are associated with this transaction:

**Document description:** Main Document**Original filename:** C:\Users\rome\Desktop\POS PI Motion.pdf**Electronic document Stamp:**

[STAMP cacdStamp\_ID=1020290914 [Date=3/17/2015] [FileNumber=19132462-0] [0ec8dea14b1ebe033f5b533926818605bdfb47230ff172fa995cc8c8207d92ee2e1 4d0e0157089bc2f82f258e2b9480fb507d421d63c53ced848cf16d0ece91b]]

CARLA A. McCUALEY (State Bar No. 223910  
carlamccauley@dwt.com

DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, 24th Floor  
Los Angeles, California 90017-2566  
Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice* pending)  
bobbalin@dwt.com

LACY H. KOONCE, III (*pro hac vice* pending)  
lancekoonce@dwt.com

SAMUEL BAYARD (*pro hac vice* pending)  
samuelbayard@dwt.com

GEORGE WUKOSON (*pro hac vice* pending)  
georgewukoson@dwt.com

DAVIS WRIGHT TREMAINE LLP  
1633 Broadway  
New York, New York 10019  
Tel.: (212) 489-8230 Fax: (212) 489-8340

ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China company; CHINA INTERNATIONAL COMMUNICATIONS CO., LTD., a China company; TVB HOLDINGS (USA), INC., a California corporation; and DISH NETWORK L.L.C., a Colorado limited liability company.

Plaintiffs.

vs.  
CREATE NEW TECHNOLOGY (HK) LIMITED, a Hong Kong company; HUA YANG INTERNATIONAL TECHNOLOGY LTD., a Hong Kong company; SHENZHEN GREATVISION NETWORK TECHNOLOGY CO. LTD., a China company; CLUB TVPAD, INC., a California corporation; BENNETT WONG, an individual; ASHA MEDIA GROUP INC. d/b/a TVPAD.COM, a Florida corporation; AMIT BHALLA, an individual; NEWTVPAD LTD CO. a/k/a TVPAD USA, a Texas corporation; LIANGZHONG ZHOU, an individual; HONGHUI CHEN d/b/a e-Digital, an individual; JOHN DOE 1 d/b/a BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV; JOHN DOE 5 d/b/a GANG YUE; JOHN DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7 d/b/a GANG TAI WU XIA; and JOHN DOES 8-10.

### Defendants.

} Case No.  
} CV 15-1869 MMM (AJWx)  
}  
} AMENDED PROOF OF  
} SERVICE BY U.S. MAIL

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On March 20, 2015, I served the foregoing document(s) described as:

1. NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION; MEMORANDUM OF POINTS AND AUTHORITIES
2. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 1 OF 7
3. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 2 OF 7
4. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 3 OF 7
5. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 4 OF 7
6. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 5 OF 7
7. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 6 OF 7
8. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 7 OF 7
9. [PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

|   |   |
|---|---|
| RENA MEHTA<br>REGISTERED AGENT<br>ASHA MEDIA GROUP<br>10031 REMINGTON DRIVE,<br>RIVERVIEW, FL 33578 | BENNETT WONG<br>CLUB TVPAD INC.<br>C/O<br>SOYEUN D. CHOI<br>ATTORNEY AT LAW<br>333 TWIN DOLPHIN DRIVE,<br>SUITE 220<br>REDWOOD SHORES, CA 94065 |
| AMIT BHALLA<br>3102 W. EL PRADO BLVD. UNIT 1<br>TAMPA, FL 33629                                     |   |

I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service.

I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

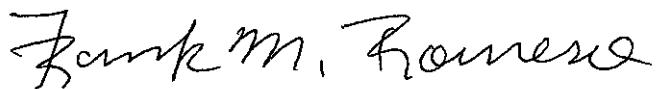
Executed on March 23, 2015, at Los Angeles, California.

Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

---

Frank M. Romero

Print Name



Signature

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On March 20, 2015, I served the foregoing document(s) described as:

1. NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION; MEMORANDUM OF POINTS AND AUTHORITIES
2. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 1 OF 7
3. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 2 OF 7
4. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 3 OF 7
5. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 4 OF 7
6. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 5 OF 7
7. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 6 OF 7
8. COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, VOLUME 7 OF 7
9. [PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

HONGHUI CHEN  
D/B/A E-DIGITAL  
815 S. MARGUERITA AVE.  
ALHAMBRA, CA 91801

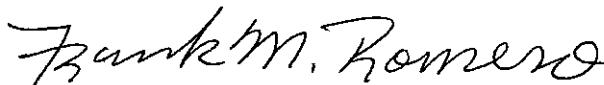
I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on March 23, 2015, at Los Angeles, California.

Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Frank M. Romero

Print Name



Signature

PROOF OF SERVICE BY MAIL

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566.

On March 23, 2015, I served the foregoing document(s) described as: **AMENDED PROOF OF SERVICE BY U.S. MAIL** by placing a **true copy** of said document(s) enclosed in a sealed envelope(s) for each addressee named below, with the name and address of the person served shown on the envelope as follows:

|   |  |
|---|--|
| Soyeon D Choi, Esq.<br><br>Attorney for Club TVpad, Inc., Bennett Wong  | 333 Twin Dolphin Drive, Suite 220<br>Redwood Shores CA 94065   |
| Rena Mehta<br>Asha Media Group  | 10031 Remington Drive,<br>Riverview, FL 33578  |
| Amit Bhalla   | 3102 W. El Prado Blvd., Unit 1<br>Tampa, FL 33629  |
| Liangzhong Zhou<br>newTVpad Ltd. Co. d/b/a newtvpad.com a/k/a TVpad USA | 7411 La Bolsa Dr.<br>Dallas, TX 75248  |
| Hongui Chen d/b/a e-Digital   | 815 S. Marguerita Ave.<br>Alhambra, CA 91801   |
| Create New Technology (HK) Limited                                      | Limited, Room D,<br>10/F, Tower A, Billion Centre,<br>1 Wang Kwong Road,<br>Kowloon Bay, Kowloon, Hong Kong, China |
| Hua Yang International Technology Ltd                                   | Room 19c, Lockhart Rd.,<br>301-307 Lockhart Rd.,<br>Wan Chai, Hong Kong, China                                     |

I placed such envelope(s) with postage thereon fully prepaid for deposit in the United States Mail in accordance with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service. I am familiar with the office practice of Davis Wright Tremaine LLP, for collecting and processing correspondence for mailing with the United States Postal Service, which practice is that when correspondence is deposited with the Davis Wright Tremaine LLP, personnel responsible for delivering correspondence to the United States Postal Service, such correspondence is delivered to the United States Postal Service that same day in the ordinary course of business.

Executed on March 23, 2015, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Frank M. Romero

Print Name

Signature

# EXHIBIT C

**McCauley, Carla**

---

**From:** Koonce, Lance  
**Sent:** Wednesday, March 25, 2015 5:59 PM  
**To:** owentse@vcclawservices.com  
**Cc:** Wukoson, George; McCauley, Carla  
**Subject:** Urgent Request  
**Attachments:** DOC.PDF

Owen:

Good morning. I hope you will be able to help us with another request in connection with our lawsuit. We urgently need to have someone deliver the attached one-page letter to Create New Technology as soon as possible. Is that something that you would be able to do this morning? We also will have a small set of papers that will then need to be delivered to Create New Technology later today. (Unfortunately, these two deliveries cannot be combined -- we need you to deliver the letter first, then the papers later once they are ready.)

If you can deliver the letter by hand for us now, can you please send an email back confirming that you will be sending someone out for delivery right away? Please copy George and Carla on your response. Also, please provide confirmation by email as soon as you have delivered the letter.

Regards,

Lance Koonce

Lance Koonce | Davis Wright Tremaine LLP  
1633 Broadway, 27th Floor | New York, NY 10019  
Tel: (212) 603-6467 | Fax: (212) 379-5207  
Email: [lancekoonce@dwt.com](mailto:lancekoonce@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.



27th Floor  
1633 Broadway  
New York, NY 10019-6708

Lance Koonce  
212.603.6467 tel  
212.379.5207 fax

[lancekoonce@dwt.com](mailto:lancekoonce@dwt.com)

March 25, 2015

**Via Hand Delivery**

Create New Technology (HK) Limited  
Room D,  
10/F, Tower A, Billion Centre,  
1 Wang Kwong Road,  
Kowloon Bay, Kowloon, Hong Kong, China

**Re: *China Central Television et al. v. Create New Technology (HK) Limited et al., CV 15-1869***

To Whom It May Concern:

We write as counsel for Plaintiffs in the above-reference action. Please note that tomorrow, March 26, 2015, Plaintiffs will be moving, ex parte, for an order shortening time on the hearing on Plaintiffs Motion for Preliminary Injunction. Specifically, Plaintiffs are requesting that the hearing for that Motion, presently set for June 8, 2015 at 10:00 a.m., be advanced to April 27, 2015, or the first available date on the Court's calendar.

The basis for the requested relief is that, at the time of the filing of the Motion, the Court's calendar dates from April through early June were closed, with the first available date for hearing on June 8, 2015. Given the nature of the relief requested by Plaintiffs in their Motion, and the irreparable nature of the harm they experience each day pending decision on their Motion, Plaintiffs are requesting an earlier hearing date that still provides all Defendants with statutory notice pursuant to Local Rule 6-1.

According to Judge Morrow's procedures, Defendants shall have 24 hours to provide a response to the ex parte application after service of Plaintiffs' Ex Parte. You must advise the Court within 24 hours of the filing and service of the Ex Parte whether you intend to file an Opposition.

Very truly yours,

A handwritten signature in black ink, appearing to read 'L. K.' followed by a cursive surname.

Lance Koonce

DWT 15264815v1 0069462-000031

Anchorage  
Bellevue  
Los Angeles

100%

New York  
Portland  
San Francisco

Seattle  
Shanghai  
Washington, D.C.

[www.dwt.com](http://www.dwt.com)

# **EXHIBIT D**

**McCauley, Carla**

---

**From:** Koonce, Lance  
**Sent:** Wednesday, March 25, 2015 6:16 PM  
**To:** oneamit@gmail.com; sales@tvpad.com  
**Cc:** McCauley, Carla  
**Subject:** Case No. CV 15-1869 MMM (AJWx)

**Re: Case No. CV 15-1869 MMM (AJWx)**

Mr. Bhalla,

Please note that tomorrow, March 26, 2015, Plaintiffs in the above entitled action will be moving, ex parte, for an order shortening time on the hearing on Plaintiffs Motion for Preliminary Injunction. Specifically, Plaintiffs are requesting that the hearing for that Motion, presently set for June 8, 2015 at 10:00 a.m., be advanced to April 27, 2015, or the first available date on the Court's calendar.

The basis for the requested relief is that, at the time of the filing of the Motion, the Court's calendar dates from April through early June were closed, with the first available date for hearing on June 8, 2015. Given the nature of the relief requested by Plaintiffs in their Motion, and the irreparable nature of the harm they experience each day pending decision on their Motion, Plaintiffs are requesting an earlier hearing date that still provides all Defendants with statutory notice pursuant to Local Rule 6-1.

According to Judge Morrow's procedures, Defendants shall have 24 hours to provide a response to the ex parte application after service of Plaintiffs' Ex Parte. You must advise the Court within 24 hours of the filing and service of the Ex Parte whether you intend to file an Opposition.

Regards,

Lance Koonce

**Lance Koonce | Davis Wright Tremaine LLP**

1633 Broadway, 27th Floor | New York, NY 10019

Tel: (212) 603-6467 | Fax: (212) 379-5207

Email: [lancekoonce@dwt.com](mailto:lancekoonce@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

Anchorage | Bellevue | Los Angeles | [New York](#) | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.

# EXHIBIT E

**McCauley, Carla**

---

**From:** McCauley, Carla  
**Sent:** Wednesday, March 25, 2015 5:45 PM  
**To:** Soyeun Choi (soyeun@soyeunesq.com)  
**Cc:** Koonce, Lance  
**Subject:** China Central Television, et al. v. CreateNewTechnology, et al./Notice of Ex Parte

**Re: Case No. CV 15-1869 MMM (AJWx)**

Dear Ms. Choi,

Please note that tomorrow, March 26, 2015, Plaintiffs in the above entitled action will be moving, ex parte, for an order shortening time on the hearing on Plaintiffs Motion for Preliminary Injunction. Specifically, Plaintiffs are requesting that the hearing for that Motion, presently set for June 8, 2015 at 10:00 a.m., be advanced to April 27, 2015, or the first available date on the Court's calendar.

The basis for the requested relief is that, at the time of the filing of the Motion, the Court's calendar dates from April through early June were closed, with the first available date for hearing on June 8, 2015. Given the nature of the relief requested by Plaintiffs in their Motion, and the irreparable nature of the harm they experience each day pending decision on their Motion, Plaintiffs are requesting an earlier hearing date that still provides all Defendants with statutory notice pursuant to Local Rule 6-1.

According to Judge Morrow's procedures, Defendants shall have 24 hours to provide a response to the ex parte application after service of Plaintiffs' Ex Parte. You must advise the Court within 24 hours of the filing and service of the Ex Parte whether you intend to file an Opposition.

Regards,  
Carla McCauley

**Carla McCauley | Davis Wright Tremaine LLP**  
865 S Figueroa Street, Suite 2400 | Los Angeles, CA 90017  
Tel: (213) 633-8665 | Fax: (213) 633-6899  
Email: [carlamccauley@dwt.com](mailto:carlamccauley@dwt.com) | Website: [www.dwt.com](http://www.dwt.com)

Anchorage | Bellevue | [Los Angeles](#) | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.

1                    **PROOF OF SERVICE BY HAND DELIVERY**

2                    I am employed in Hong Kong Special Administrative Region of the People's Republic of  
3                    China, I am over the age of 18 and not a party to the within action. My business address is 57/F  
                      Cheung Kong Center, 2 Queen's Road Central, Hong Kong.

4                    On March 26, 2015, I served the following document(s):

5                    1. EX PARTE APPLICATION TO ADVANCE HEARING ON PLAINTIFFS' MOTION  
6                    FOR PRELIMINARY INJUNCTION FROM JUNE 8, 2015 TO APRIL 27, 2015;  
                      DECLARATION OF CARLA A. MCCUALEY AND EXHIBITS A THROUGH E

7                    2. [PROPOSED] ORDER GRANTING PLAINTIFFS' EX PARTE APPLICATION TO  
8                    ADVANCE THE HEARING ON PLAINTIFFS' MOTION FOR PRELIMINARY  
                      INJUNCTION TO APRIL 27, 2015

9                    on the below parties in this action or proceeding, by personally delivering a copy thereof, enclosed  
                      in a sealed envelope(s), to the addressee(s) at the following address(es):

10                  **Create New Technology (HK) Limited, Room D, 10/F, Tower A, Billion Centre, 1 Wang  
11                  Kwong Road, Kowloon Bay, Kowloon, Hong Kong**

12                  Executed on March 26, 2015, at Hong Kong Special Administrative Region of the People's  
                      Republic of China.

13                   Federal    I declare under penalty of perjury under the laws of the United States of America  
14                  that the foregoing is true and correct and that I have served the above referenced  
                      documents at the direction of a member of the bar of this Court.

15                  \_\_\_\_\_  
16                  Chan Winnie  
                      Print Name

15                  \_\_\_\_\_  
16                    
                      Signature

|  |               |  |                                  |
|--|---------------|--|----------------------------------|
| <p>CARLA A. McCUALEY<br/>DAVIS WRIGHT TREMAINE LLP<br/>865 S. FIGUEROA ST, SUITE 2400 LOS ANGELES, CA 90017<br/>Attorney For: Plaintiffs</p> <p>TELEPHONE NO.: (213) 633-6800<br/>E-MAIL ADDRESS (Optional):</p> |               | SBN: 223910                                | FOR COURT USE ONLY               |
| <p>UNITED STATES DISTRICT COURT<br/>STREET ADDRESS:<br/>MAILING ADDRESS:<br/>CITY AND ZIP CODE:, CA<br/>BRANCH NAME: CENTRAL DISTRICT OF CALIFORNIA</p>  |               |  |                                  |
| <p>PLAINTIFF(name each): CHINA CENTRAL TELEVISION, ETC., ET AL.<br/>DEFENDANT(name each): CREATE NEW TECHNOLOGY (HK) LIMITED, ETC., ET AL.</p>   |               | <p>CASE NUMBER:<br/>15-1869 MMM (AJWx)</p> |                                  |
| PROOF OF DELIVERY  | HEARING DATE: | TIME:                                      | DEPT.:                           |
|  |               |  | Ref No. or File No.:<br>94038-21 |

AT THE TIME OF SERVICE I WAS AT LEAST 18 YEARS OF AGE AND NOT A PARTY TO THIS ACTION, AND I SERVED COPIES OF THE:

[PROPOSED] ORDER GRANTING PLAINTIFFS' EX PARTE APPLICATION TO ADVANCE THE HEARING ON PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION TO APRIL 27, 2015; EX PARTE APPLICATION TO ADVANCE HEARING ON PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION FROM JUNE 8, 2015 TO APRIL 27, 2015; DECLARATION OF CARLA A. McCUALEY AND EXHIBITS A THROUGH E

NAME OF PARTY: SOYEUM D. CHOI, ESQ.

DELIVERED TO: JENNIFER CHAN - FRONT DESK RECEPTIONIST

DATE & TIME OF DELIVERY: 03/26/2015  
10:45 am

ADDRESS, CITY, AND STATE: ATTORNEY AT LAW  
333 TWIN DOLPHIN, SUITE 220  
REDWOOD CITY, CA 94065

MANNER OF SERVICE:

Delivery to a Business: Service was made by delivery to the business office; or by leaving the document(s) with his clerk over the age of 18 therein; or with a person having charge thereof; or if there was no such person in the office, by leaving them between the hours of nine in the morning and five in the afternoon, in a conspicuous place in the office. [CCP 1011]

Fee for Service:  
 County: SAN FRANCISCO  
Registration No.: 895  
Nationwide Legal, LLC (12-234648)  
1609 James M. Wood Blvd., 2nd Fl  
Los Angeles, CA 90015  
(213) 249-9999  
Ref: 94038-21

I declare under penalty of perjury under the laws of The State of California that the foregoing information contained in the return of service and statement of service fees is true and correct and that this declaration was executed on March 26, 2015.

Signature: \_\_\_\_\_

MARCO ANTONIO DE LA FUENTE

PROOF OF SERVICE BY FEDERAL EXPRESS

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Davis Wright Tremaine, LLP, Suite 2400, 865 South Figueroa Street, Los Angeles, California 90017-2566. I am familiar with the practice at my place of business for collection and processing of correspondence for overnight delivery by Federal Express. Such correspondence will be deposited with a facility regularly maintained by Federal Express for receipt on the next business day.

On March 26, 2015, I served the following document(s):

1. EX PARTE APPLICATION TO ADVANCE HEARING O PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION FROM JUNE 8, 2015 TO APRIL 27, 2015; DECLARATION OF CARLA A. MCCUALEY AND EXHIBITS A THROUGH E
2. PROPOSED ORDERGRANTING PLAINTIFFS' EX PARTE APPLICATION TO ADVANCE THE HEARING ON PLAINTIFFS' MOTIN FOR PRELIMINARY INJUNCTION TO APRIL 27, 2015

by placing a **true copy or original** in a separate envelope for each addressee named below, with the name and address of the person served shown on the envelope as follows:

Rena Mehta  
Asha Media Group  
10031 Remington Drive,  
Riverview, FL 33578

Amit Bhalla  
3102 W. El Prado Blvd., Unit 1  
Tampa, FL 33629

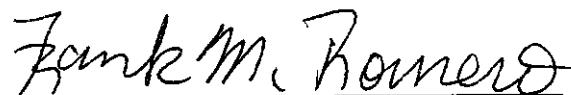
and by sealing the envelope and placing it for collection and delivery by Federal Express with delivery fees paid or provided for in accordance with ordinary business practices.

Executed on March 26, 2015, at Los Angeles, California.

Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Frank M. Romero

Print Name



Signature